1 2 3 4 5	Yavar Bathaee (CA 282388) yavar@bathaeedunne.com Andrew C. Wolinsky (CA 345965) awolinsky@bathaeedunne.com 445 Park Avenue, 9th Floor New York, NY 10022 (332) 322-8835	SCOTT+SCOTT ATTORNEYS AT LAW LLP Amanda F. Lawrence (pro hac vice) alawrence@scott-scott.com Patrick J. McGahan (pro hac vice) pmcgahan@scott-scott.com Michael P. Srodoski (pro hac vice) msrodoski@scott-scott.com 156 South Main Street, P.O. Box 192 Colchester, CT 06415 Tel.: (860) 537-5537	
6 7 8 9 10 11 12 13	Brian J. Dunne (CA 275689) bdunne@bathaeedunne.com Edward M. Grauman (pro hac vice) egrauman@bathaeedunne.com 901 S. MoPac Expressway Barton Oaks Plaza I, Suite 300 Austin, TX 78746 (213) 462-2772 Interim Co-Lead Counsel for the Advertiser Classes	Patrick J. Coughlin (CA 111070) pcoughlin@scott-scott.com Carmen A. Medici (CA 248417) cmedici@scott-scott.com Hal D. Cunningham (CA 243048) hcunningham@scott-scott.com Daniel J. Brockwell (CA 335983) dbrockwell@scott-scott.com 600 W. Broadway, Suite 3300 San Diego, CA 92101 Tel.: (619) 233-4565 (Additional counsel on signature page)	
14 15	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
16	SAN FRANCISCO DIVISION		
17	MAXIMILIAN KLEIN, et al.,	Case No. 20-cv-08570-JD	
18	Plaintiffs,	Hon. James Donato	
19 20	V.	ADVERTISER PLAINTIFFS' ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL AND NOTICE OF LODGING PURSUANT TO	
21	META PLATFORMS, INC.,		
22	Defendant.	CIVIL LOCAL RULE 79-5 AND THE COURT'S SEPTEMBER 20, 2023 ORDER	
23			
24			
25			
26			
27			
28			

Case 3:20-cv-08570-JD Document 665 Filed 10/13/23 Page 2 of 3

1	Pursuant to Civil Local Rules 7-11 and 79-5, and the Stipulation and Order Modifying Sealing	
2	Procedures Relating to Class Certification Briefing and Related Documents, entered in this action on	
3	September 20, 2023 (Dkt. 656), Advertiser Plaintiffs Affilious, Inc., Jessyca Frederick, Mark Berney,	
4	406 Property Services, PLLC, Mark Young, and Katherine Looper ("Advertiser Plaintiffs") submit	
5	this administrative motion to file under seal the unredacted versions of Advertiser Plaintiffs'	
6	Opposition to Defendant Meta Platforms, Inc.'s Motion to Exclude Testimony of Joshua Gans, as	
7	well as Exhibits 1-3 to the Declaration of Yavar Bathaee in their entirety. Pursuant to the Court's	
8	Order (Dkt. 656), the reasons for sealing will be set forth in a forthcoming omnibus sealing motion,	
9	to be filed no later than November 21, 2023. Advertiser Plaintiffs also hereby provide notice of	
10	lodging to all parties and their counsel pursuant to Civil Local Rule 79-5.	
11	Advertiser Plaintiffs respectfully request that the documents filed provisionally under seal	
12	herewith be maintained under seal pending a decision by the Court on the parties' forthcoming	
13	Omnibus Sealing Motion.	
14		
15		
16		

1	Dated: October 13, 2023	Respectfully submitted,
2		By: /s/Brian J. Dunne
3	SCOTT+SCOTT ATTORNEYS AT LAW LLP	BATHAEE DUNNE LLP
4	Amanda F. Lawrence (pro hac vice)	Yavar Bathaee (CA 282388)
5	alawrence@scott-scott.com Patrick J. McGahan (<i>pro hac vice</i>) pmcgahan@scott-scott.com	yavar@bathaeedunne.com Andrew C. Wolinsky (CA 345965)
6	Michael P. Srodoski (pro hac vice)	awolinsky@bathaeedunne.com Adam Ernette (<i>pro hac vice</i>)
7	msrodoski@scott-scott.com 156 South Main Street, P.O. Box 192	aernette@bathaeedunne.com
8	Colchester, CT 06415 Tel.: (860) 537-5537	Priscilla Ghita (<i>pro hac vice</i>) pghita@bathaeedunne.com
9	Patrick J. Coughlin (CA 111070)	Chang Hahn (<i>pro hac vice</i>) chahn@bathaeedunne.com
10	pcoughlin@scott-scott.com Carmen A. Medici (CA 248417)	445 Park Avenue, 9th Floor New York, NY 10022
11	cmedici@scott-scott.com Hal D. Cunningham (CA 243048)	(332) 322-8835
12	hcunningham@scott-scott.com Daniel J. Brockwell (CA 335983)	Brian J. Dunne (CA 275689)
13	dbrockwell@scott-scott.com 600 W. Broadway, Suite 3300	bdunne@bathaeedunne.com Edward M. Grauman (<i>pro hac vice</i>)
14	San Diego, CA 92101 Tel.: (619) 233-4565	egrauman@bathaeedunne.com Andrew M. Williamson (CA 344695)
15	Patrick J. Rodriguez (pro hac vice)	awilliamson@bathaeedunne.com
16	prodriguez@scott-scott.com 230 Park Avenue, 17th Floor New York, NY 10160	901 S. MoPac Expressway Barton Oaks Plaza I, Suite 300
17	New York, NY 10169 Tel.: (212) 223-6444	Austin, TX 78746 (213) 462-2772
18	AHDOOT & WOLFSON, PC Tina Wolfson (CA 174806)	Allison Watson Cross (CA 328596)
19	Robert Ahdoot (CA 174000) Theodore W. Maya (CA 223242)	across@bathaeedunne.com
20	Henry J. Kelston (<i>pro hac vice</i>) 2600 West Olive Avenue, Suite 500	3420 Bristol St., Ste 600 Costa Mesa, CA 92626-7133
21	Burbank, CA 91505 Telephone: (310) 474-9111	LEVIN SEDRAN & BERMAN LLP
22	Facsimile: (310) 474-8585 twolfson@ahdootwolfson.com	Keith J. Verrier (<i>pro hac vice</i>) Austin B. Cohen (<i>pro hac vice</i>)
23	rahdoot@ahdootwolfson.com tmaya@ahdootwolfson.com	510 Walnut Street, Suite 500 Philadelphia, PA 19106-3997
24	unaya@andootwonson.com	Tel.: (215) 592-1500 Fax: (215) 592-4663
25		kverrier@lfsblaw.com acohen@lfsblaw.com
26	Interim Co-Lead Counsel and Executive Committee	-
27	for the Advertiser Classes	
_		

28